

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 21-21177-GLT
)	
LaVonne Clanagan)	Chapter 13
Debtor)	
)	Doc. No.:
)	
LaVonne Clanagan)	
Movant)	
)	
v.)	
)	
HSBC Bank USA, N.A. and)	
Ronda J. Winnecour, Trustee)	
Respondent)	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to r: HSBC Bank USA, N.A.'s Notice of Mortgage Payment Change dated April 22, 2022, the Debtor's current escrow payment for account number ending in **0689** is **\$59.49**. The new escrow payment is **\$301.50**. The new total mortgage payment is **\$738.50** effective June 1, 2024. The Debtor will pay the escrow shortage in addition to her regular monthly Chapter 13 plan payment.

Dated: **May 8, 2024**

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Respectfully submitted by:

/s/ LaVonne Clanagan
LaVonne Clanagan

Respectfully submitted by:

/s/ Albert G. Reese, Jr., Esquire
Albert G. Reese, Jr., Esquire
Attorney for Debtor
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